

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK  
VARIABLE LIFE INSURANCE  
COMPANY, and MANULIFE  
INSURANCE COMPANY (f/k/a  
INVESTORS PARTNER LIFE INSURANCE  
COMPANY),

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

CIVIL ACTION NO. 05-11150-DPW

**PLAINTIFFS' ASSENTED TO MOTION FOR  
IMPOUNDMENT OF CONFIDENTIAL INFORMATION**

Pursuant to Local Rule 7.2, Plaintiffs John Hancock Life Insurance Company, John Hancock Variable Life Insurance Company, and Manulife Insurance Company (f/k/a/ Investors Partner Life Insurance Company) (collectively, "John Hancock" or "Plaintiffs") respectfully move this Court for leave to file the following documents under seal until further Order of the Court:

1. Plaintiffs' Motion for Leave to Amend Supplemental Complaint and exhibits attached thereto (collectively, the "Motion");
2. Plaintiffs' Memorandum in Support of Their Motion for Leave to Amend Supplemental Complaint (the "Memorandum");
3. Proposed Order Granting John Hancock's Motion for Leave to Amend Supplemental Complaint (the "Proposed Order"); and

4. Affidavit of Stacy L. Blasberg, dated October 24, 2006, and supporting exhibits (collectively, the "Blasberg Affidavit").

The grounds for this motion are:

1. This action arises out of a certain Research Funding Agreement, (the "Agreement") dated March 13, 2001, between John Hancock and Abbott Laboratories ("Abbott"). The Agreement is, by its terms, confidential.

2. The Motion, Memorandum, Proposed Order, and Blasberg Affidavit rely upon and discuss the confidential terms of the Agreement.

3. The Agreement also forms the basis for John Hancock's claims in the related action captioned *John Hancock Life Ins. Co., et al. v. Abbott Laboratories*, Civil Action No. 03-12501-DPW ("*Hancock I*").

4. The terms of the Agreement may not be disclosed without the prior consent of the non-disclosing party. Throughout this action, as well as *Hancock I*, the Agreement has not been publicly disclosed.

5. In compliance with Local Rule 7.1(A)(2), John Hancock has sought and obtained the consent of Abbott to this Motion for Impoundment of Confidential Information.

WHEREFORE, John Hancock respectfully requests that the Motion, Memorandum, Proposed Order, and Blasberg Affidavit be impounded until further Order of the Court. In addition, John Hancock respectfully requests that the Court accept these documents provisionally under Seal pending the Court's ruling on this Motion. Upon termination of the impoundment

period, John Hancock will retrieve and take custody of the Motion, Memorandum, Proposed Order, and Blasberg Affidavit.

Respectfully submitted,

JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE  
LIFE INSURANCE COMPANY AND  
MANULIFE INSURANCE COMPANY

By their attorneys,

/s/ Karen Collari Troake

Brian A. Davis (BBO No. 546462)

Joseph H. Zwicker (BBO No. 560219)

Karen Collari Troake (BBO No. 566922)

Stacy L. Blasberg (BBO No. 657420)

CHOATE, HALL & STEWART LLP

Two International Place

Boston, Massachusetts 02110

Telephone: 617-248-5000

Date: October 24, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and that paper copies will be sent to those non-registered participants (if any) on October 24, 2006.

/s/ Stacy L. Blasberg

Stacy L. Blasberg